

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

**Case No. 4:23-CR-00163**

v.

**(Judge Brann)**

JEREMY PAULEY

**DEFENDANT'S MOTION TO CONTINUE PSR OBJECTIONS DEADLINE**

AND NOW, this 1<sup>st</sup> day of March 2024, comes the Defendant, Jeremy Pauley, by and through his attorney, Jonathan R. White, Esquire and DETHLEFS-PYKOSH LAW GROUP LLC, and respectfully requests This Honorable Court to grant this Motion to Continue PSR Objections and in support thereof avers as follows:

1. On January 19, 2024, a Draft Pre-Sentence Report was filed by Probation for the above Defendant.
2. Objections to the Pre-Sentence Report are due on March 5, 2024.
3. Undersigned counsel and the AUSA are currently undergoing negotiations regarding loss amounts and restitution.
4. Additional PSR Objection discussions are needed between undersigned counsel and defendant.
5. There are extensive discovery documents in the within matter.
6. Due to the uniqueness of the facts of the case and laws in the area, additional extensive research is needed regarding matters contained in the PSR.
7. Due to the aforementioned, defendant is respectfully requesting a 30-45 day continuance of the PSR Objections Deadline.
8. Defense counsel contacted Assistant United States Attorney Sean Camoni, Esquire, who is in concurrence with the filing of this Motion.

WHEREFORE, a 30–45 day continuance of the PSR Objections Deadline is respectfully requested.

Respectfully submitted,  
**DETHLEFS-PYKOSH LAW GROUP, LLC**

Dated: March 1, 2024

/s/ Jonathan R. White

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